

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

PERSONAL AUDIO, LLC,

Plaintiff,

v.

TOGI ENTERTAINMENT, INC. et al

Defendants.

2:13-cv-13 Consolidated Action

JURY TRIAL DEMANDED

**PLAINTIFF PERSONAL AUDIO, LLC AND
DEFENDANTS NBCUNIVERSAL MEDIA, LLC; CBS CORPORATION; FOX
BROADCASTING COMPANY; AND FOX NETWORKS GROUPS, INC. JOINT
MOTION, PER ORDER OF THE COURT, REGARDING TECHNICAL DISCOVERY
RELEVANT TO NATIVE MOBILE APPLICATIONS**

Pursuant to oral order of the Court on May 29, 2014, Plaintiff Personal Audio, LLC and Defendants NBC, CBS and FOX jointly submit this motion regarding technical discovery related to native mobile applications.

Per the Court's Oral Order at the Motion to Compel Hearings on May 29, 2014, the parties have agreed to a limited scope of document requests and 30(b)(6) deposition topics concerning technical discovery on relevant native mobile applications. These requests are set forth in the attached Exhibit A, attached herewith.

The Defendants will search for and produce high level documents responsive to the agreed document requests within their custody or control and make responsive source code in their custody or control available to Plaintiff's expert for inspection. If Plaintiff believes it is necessary after reviewing the documents produced by a Defendant, Plaintiff may depose one

representative from that Defendant for no more than four hours per witness on the topics set forth in Exhibit A.

The parties respectfully request that this motion be granted and the attached order be entered by the Court so as to proceed with this discovery as the Court set forth in its May 29, 2014 oral order.

Date: June 2, 2014

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, the foregoing was served on all counsel of record who have consented to electronic service. Local Rule CV-5. Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5, all others not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing via email on this 2nd day of June, 2014.

/s/ Papool S. Chaudhari

Papool S. Chaudhari